

1 April 2025

Your Ref: Mount Gibson Gold Project – APP 0025375

Department of Climate Change, Energy, the Environment and Water
GPO Box 787
Canberra, ACT 2601

Via email: [REDACTED]

EPBC 2023/09745 Mt Gibson Gold Project - Variation Request

As discussed in our meeting on 14th March 2025, the proponent of the Mt Gibson Gold Project, Crimson Metals Pty Ltd, is requesting the Minister to accept a variation (the Varied Proposal) to the Original Proposal referred to DCCEEW on 14 December 2023 and which is currently in the Draft Public Environment Review stage of the assessment. This request is made under Division 1A, Section 156A of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

In summary the content of the Varied Proposal includes:

- Amendment to the Development Envelope (DE) to include the existing Airstrip and modifications required to meet Civil Aviation Safety Authority (CASA) regulations and operating workforce requirements.
- An additional 50 hectares (ha) of Disturbance Footprint (DF) within the DE relating to the existing Airstrip (27 ha of existing disturbance) and modifications to meet CASA regulations (23 ha of new disturbance).

The Varied Proposal does not materially change the nature or intensity of the operation and does not introduce any new Matters of National Environmental Significance (MNES).

The following is provided to support this request in accordance with Div 5.4 of the EPBC Act regulations

(a) Details of the proposed variation to the action

The Original Proposal included the DF and DE of the mining operations only. Early consultation with DCCEEW in November 2023 highlighted the requirement for a future Airstrip to manage transport of the operating workforce for the Proposal. At that time suitable location options were being investigated that would meet both the CASA safety requirements and minimise environmental impacts to known MNES included in Table 1.

Crimson Metals has now finalised an Airstrip location that meets both of these objectives and utilises the cleared footprint of the existing Airstrip with minor modification.

(b) Reasons for the proposed variation

The existing Airstrip has been utilised for the Project Development/Exploration phase of the Proposal to transport site personnel to and from Perth. The existing Airstrip has a short runway and there are limitations to the size and seating capacity of a compliant aircraft under CASA regulations. This limited seating capacity does not meet current workforce numbers and many personnel currently travel the 800 kilometre round trip (approx. 10 hour journey) via road.

During the Construction and Operations phase, the workforce will increase significantly, and the existing Airstrip design/size does not allow the utilisation of larger aircraft with higher seating capacity to land and

take-off safely in accordance with CASA standards. Addition of Airstrip modifications to the Proposal will enable the safe transportation of employees and reduce road transportation considered to be a high safety risk.

(c) how the impacts of the proposed variation on matters of national environmental significance compare with those of the original proposal;

Whilst the overall DF will increase, there will only be minor changes to impacts to MNES. Fauna MNES recorded within both the Original and Varied DF are the Malleefowl and *Idiosoma kopejtkorum* (Nigrum group) and are most relevant to the Varied Proposal. The Original Proposal considered two other species, *Dasyurus geoffroyi* (Chuditch) translocated by the Australian Wildlife Conservancy (AWC) to the nearby Mount Gibson Wildlife Sanctuary, which has not been recorded in any Proposal related fauna surveys, and the *Aphelocephala leucopsis* (Southern Whiteface) recorded once in the southeast extremity of the DE, with six records north of the DE where the habitat is deemed more favourable for the Whiteface. The outcomes of the direct and indirect impact assessment conducted for the Original Proposal determined that there would be negligible, if any, impacts to the Chuditch and Southern Whiteface, this outcome will not change with the Varied Proposal. On this basis, these two species have not been considered further in this application. Table 1 compares the impacts to MNES from the Original Proposal to the Varied Proposal. This is displayed in Figure 1.

Table 1: Comparison of impacts to MNES from the Original Proposal and Varied Proposal

Aspect	Area (ha)		
	Original Proposal	Varied Proposal	Change
Development Envelope	~3,723	~3,820	97
Disturbance Footprint	1,562	1,612	50
Previously cleared areas within Disturbance Footprint	~372	~399	~27
Fauna habitat (native vegetation) of varying suitability for fauna MNES	1,174	1,212.5	38.5
<i>Leipoa ocellata</i> (Malleefowl) preferred habitat VSA2: Allocasuarina Shrubland	20	41	21
<i>Idiosoma kopejtkorum</i> preferred habitat VSA4: Eucalypt Woodland	251	266	15
<i>Eremophila viscida</i> (T) individuals	0	0	0
Eucalypt Woodlands of the West Australian Wheatbelt TEC	27.1	27.5	0.4
Malleefowl mounds	2 active 7 inactive	2 active 8 inactive	0 1 inactive
<i>Idiosoma kopejtkorum</i> active burrows	61	67	6

(d) The impacts of the proposed variation on matters of national environmental significance not considered in the referral or assessment of the original proposal

The Varied Proposal will not impact any additional MNES not considered in the Original Proposal. It is understood that AWC has translocated other species to its Mount Gibson Wildlife Sanctuary, however these are confined to the fenced 'enclosure' to protect them from predation by feral predators (Cat, Fox) outside the 'enclosure' and are not relevant to the Original or Varied Proposal's. These species include:

1. *Lagostrophus fasciatus fasciatus* (Banded Hare Wallaby)
2. *Macrotis lagotis* (Greater Bilby)
3. *Perameles bouganville* (Shark Bay Bandicoot).

(e) Alternatives, mitigation measures and offsets to compensate for additional impacts on matters of national environmental significance

The Proponent considered an alternative Airstrip location to that which is the subject of this amendment application. This alternative location was chosen in an effort to avoid any additional impact to the Eucalypt Woodlands of the West Australian Wheatbelt TEC and manage land access constraints associated with the AWC Mt Gibson Reserve. However following assessment of this alternative, the Proponent disregarded this location as it would result in additional disturbance to fauna habitat and fragment this portion of contiguous habitat suitable for MNES, particularly the Malleefowl.

Table 2 compares the impacts to MNES from the Varied Proposal airstrip location and the alternative Airstrip originally considered by the Proponent. This is displayed in Figure 2.

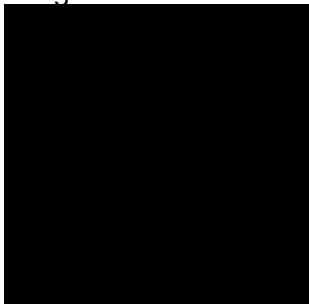
Table 2: Comparison of impacts of alternative airstrip location

Aspect	Area (ha)	
	Varied Proposal Airstrip	Alternative Airstrip
Development Envelope	~3,820	~ 4,082
Disturbance Footprint	1,612	1,686
Previously cleared areas within Disturbance Footprint	399	390
Fauna habitat (native vegetation) of varying suitability for fauna MNES	1,212.5	1,296
<i>Eremophila viscida</i> (T) individuals	0	0
Eucalypt Woodlands of the West Australian Wheatbelt TEC	27.5	27.1
Malleefowl mounds	2 active 8 inactive	2 active 13 inactive
<i>Idiosoma kopejtkorum</i> active burrows	67	61

As there are only minor differences in impacts to MNES from the proposed variation, no additional mitigation measures or offsets require consideration. Mitigation measures and offsets included in the Original Proposal remain relevant to the proposed variation.

Don't hesitate to contact me if you would like to discuss this matter further on mobile [REDACTED] or via email [REDACTED].

Regards



Managing Director | Principal Consultant
Tetris Environmental Pty Ltd

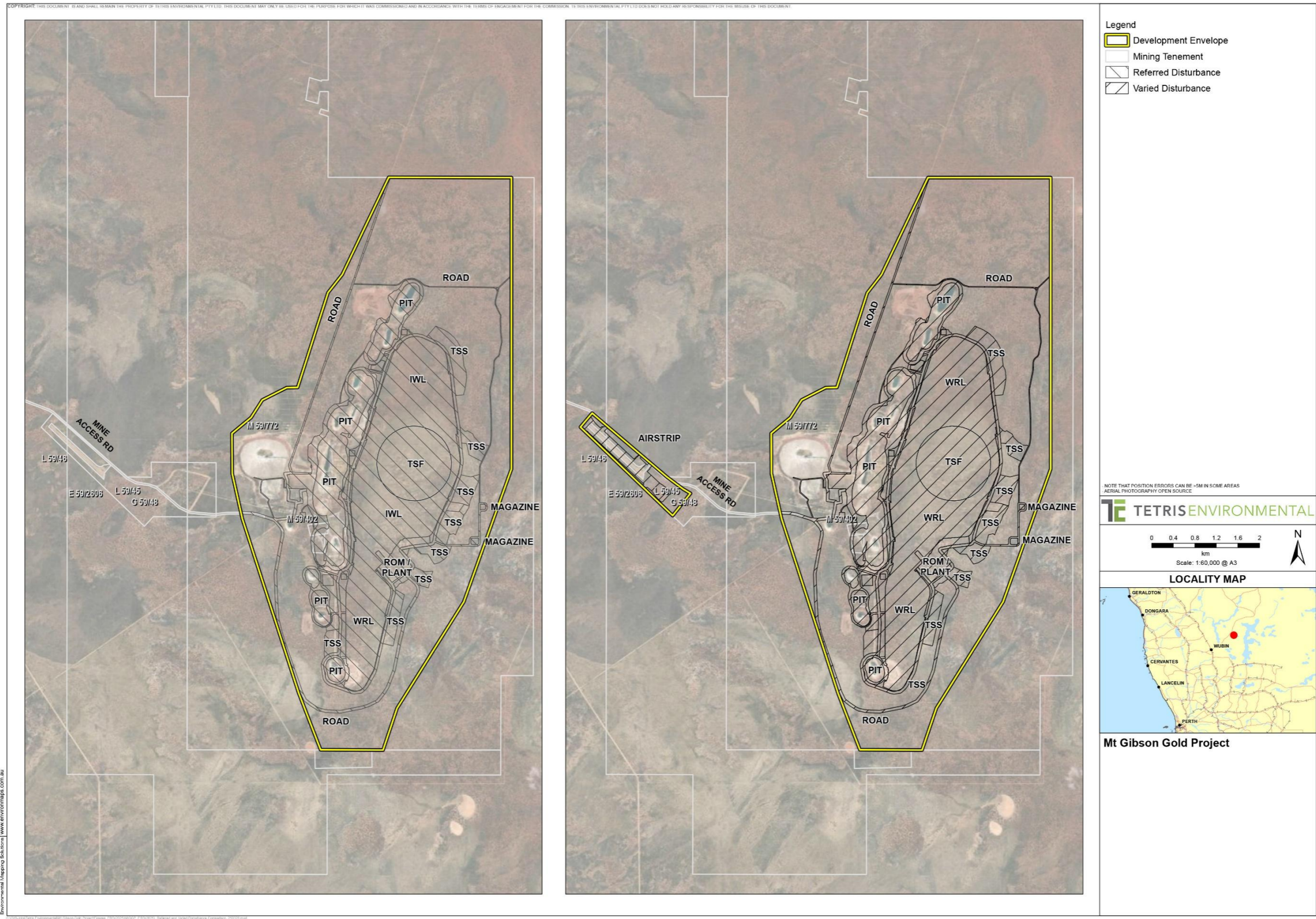


Figure 1: Comparison of Original and Varied Proposal



Figure 2: Comparison of proposed and alternative airstrip location